

facilities known as the Northeast Energy Direct project (“NED Project”). A portion of the NED Project is proposed to cross approximately 70 miles in New Hampshire. If Tennessee’s application is granted, a significant new energy facility will be sited in the State of New Hampshire.

Accordingly, as the public body responsible for regulating the siting and monitoring of energy facilities in the State of New Hampshire, the SEC has a direct and substantial interest in this proceeding. The SEC’s intervention in this docket will not cause prejudice to, or additional burdens on, any other party to the proceedings, and will not cause any disruption to the proceedings.

The SEC has not yet received any application relative to the NED Project but Tennessee has indicated that it plans to file an application with the SEC.¹ As a quasi-judicial body that has not had an opportunity to perform its own review, the SEC currently neither supports nor opposes the NED Project. To preserve its impartiality, the SEC does not intend to take any positions on procedural or substantive motions before FERC prior to the final decision of the SEC. The SEC moves to intervene to obtain party status and preserve its rights to participate in the review process, including the ability to seek judicial review of any final decision on Tennessee’s application where necessary to protect the interests of the State of New Hampshire and to the extent such decision may be inconsistent with any findings or decision of the SEC.

II. PLEADINGS AND SERVICE CONTACTS

Service of all pleadings and other filings in this proceeding should be addressed to the following persons, whose names should be placed on the official service list prepared by the Secretary in this docket:

¹ On November 16, 2015, Tennessee submitted a filing to the SEC stating Tennessee’s intention to submit an application and provided notice of the pre-filing public information sessions required by RSA 162-H:10, I.

Pamela Monroe
Administrator
New Hampshire Site Evaluation
Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

Brian W. Buonamano
Assistant Attorney General
Bureau of Civil Law
New Hampshire Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

III. CONCLUSION

WHEREFORE, the New Hampshire Site Evaluation Committee respectfully requests that the Commission grant this motion to intervene and grant the SEC full party status in this proceeding.

Dated this 14th day of January, 2016

Respectfully submitted,

State of New Hampshire
Site Evaluation Committee

By its attorneys,

Joseph A. Foster
Attorney General

Brian W. Buonamano
Brian W. Buonamano
Assistant Attorney General
Bureau of Civil Law
New Hampshire Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, New Hampshire, 03301
(603) 271-3679
brian.buonamano@doj.nh.gov

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Concord, New Hampshire, this 14th day of January, 2016.

Brian W. Buonamano _____
Brian W. Buonamano
Assistant Attorney General
Bureau of Civil Law
New Hampshire Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603) 271-3650
brian.buonamano@doj.nh.gov